

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

SEAN YOUNG; FOREVER YOUNG
BAKERIES LLC; and FOREVER YOUNG
PROPERTIES LLC,

Plaintiffs,

vs.

TOWN OF CONWAY, NEW HAMPSHIRE

Defendant.

Civil No. 1:23-cv-00070

MOTION FOR PRO HAC VICE ADMISSION OF ELIZABETH SANZ

Pursuant to Rule 83.2(b) of the Local Civil Rules of the United States District Court for the District of New Hampshire, Plaintiffs Sean Young, Forever Young Properties LLC, and Forever Young Bakeries LLC, hereby request the *pro hac vice* admission of Elizabeth Sanz, to appear and practice on Plaintiffs' behalf in the above-captioned matter.

This motion rests on the following grounds:

1. The undersigned, John M. Crabbs, II, Esq., is a member in good standing of the bar of this Court and counsel for Plaintiffs. Ms. Sanz shall at all times remain associated with this action with Mr. Crabbs, upon whom all process, notices, and other papers shall be served, who shall sign all filings submitted to the Court and who shall attend all proceedings, unless excused by the Court.

2. Attached hereto as Exhibit A is the affidavit of Elizabeth Sanz, affirming she is a member in good standing of each of the courts to which she has been admitted and has never been the subject of any disciplinary proceedings in any jurisdiction.

3. Pursuant to Local Rule 7.1(a)(2), no memorandum of law is submitted with this motion, because the relief sought rests within the sound discretion of the Court.

4. Pursuant to Local Rule 83.2(b)(2), the required fee of \$100 is being submitted herewith.

5. Plaintiffs have not sought Defendants' assent to this motion as no counsel has appeared for Defendants in this matter.

For the reasons stated herein, Plaintiffs respectfully request that this Court enter an Order allowing Elizabeth Sanz to practice before this Court for the purposes of this action.

Dated: January 31, 2023

Respectfully Submitted,

/s/ John M. Crabbs, II
John M. Crabbs, II (NH Bar No. 275043)
COOPER CARGILL CHANT, P.A.
2935 White Mountain Highway
North Conway, NH 03860
603-450-5000
jcrabbs@coopercargillchant.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 31st day of January 2023, I caused a true and correct copy of the foregoing Motion for *Pro Hac Vice* Admission of Elizabeth Sanz to be electronically filed using the Court's CM/ECF system. A copy of the foregoing document will be served by Carroll County Sheriff's Department upon Defendant as follows:

Town of Conway
23 Main Street
Conway, NH 03818

/s/ John M. Crabbs, II
John M. Crabbs, II (NH Bar No. 275043)

EXHIBIT A

UNITED STATES DISTRICT COURT
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TOWN OF CONWAY, NEW HAMPSHIRE

Defendant.

Civil No. 1:23-cv-_____

AFFIDAVIT OF ELIZABETH SANZ
IN SUPPORT OF MOTION FOR ADMISSION *PRO HAC VICE*

In accordance with Rule 83.2 (b)(1) of the Local Rules of the United States District Court for the District of New Hampshire, I, Elizabeth Sanz, declare under penalty of perjury that the following is true and correct:

1. I am an attorney with the Institute for Justice, 901 North Glebe Road, Suite 900, Arlington, Virginia, 22203. My telephone number is (703) 682-9320. My email address is bsanz@ij.org.

2. I am licensed to practice law by the State of California and was admitted to the bar of the State of California on November 19, 2021. I am also authorized to practice law in the United States Court of Appeals for the Fifth Circuit (December 15, 2022).

3. I am currently and at all times have been a member in good standing and eligible to practice in each of the courts or jurisdictions listed herein.

4. I am not currently and have never been the subject of an investigation in any disciplinary proceedings.

5. I have never been denied admission to practice before any court, nor have I ever been suspended or disbarred.

6. I have associated myself with John M. Crabbs, II in this matter who is a member in good standing of the Bar of this Court.

7. I respectfully request that this Court grant my motion for admission *pro hac vice* and that I be allowed to appear in all further proceedings before this Court regarding this matter.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 27th day of January 2023.

/s/ Elizabeth Sanz
Elizabeth Sanz

STATE OF VIRGINIA

ARLINGTON COUNTY

Signed and sworn before me this 27th day of January 2023 by Elizabeth Sanz in Arlington County, Virginia.

/s/ Cara Di Silvio
Cara Di Silvio Notary Public
State of Virginia, County of Arlington
My commission expires November 30, 2023
Acting in Arlington County